

United States District Court
for the Northern District of Texas

Amarillo Division

DEC 14 2023 AM 11:50
FILED - USDC - NDTX - AM

United States of America,
Plaintiff,

FPC Bryan, TX
Place of Confinement

v.

579 331 - 177
Federal Register Number

Krystal Kao Vang
Defendant.

2:18-CR-095-Z
Criminal Case Number

Defendant's Motion for Reduction of Sentence pursuant to 18 U.S.C. § 3582(c)(2)
and Amendment 821 to the Federal Sentencing Guidelines:

X

Based on U.S.S.G. § 4C1.1 Adjustment for Zero-Point
Offenders (for those assessed zero criminal history points at
sentencing)

X

Based on U.S.S.G. § 4A1.1(d) & (e) Criminal History Category
(for those who received "status" points for being under a
criminal justice sentence at the time of the offense)

Instructions - Read Carefully

1. The court has received your request regarding a sentence reduction under Amendment 821 to the Sentencing Guidelines (effective November 1, 2023). You must complete this form motion and return it to the appropriate divisional office listed in instruction 3, below, to enable the court to consider your request. This form should only be used when requesting a sentence reduction pursuant to Amendment 821 to the Sentencing Guidelines and for no other purpose. Amendment 821 provides for reduction in offense level for certain offenders with zero criminal history points (U.S.S.G. § 4C1.1) and reduces or eliminates status points for certain offenders who previously received status points pursuant to U.S.S.G. § 4A1.1(d). Amendment 825 authorizes retroactive reductions effective February 1, 2024 or later. A copy of your original request is included with this form for your reference.
2. This motion must be legibly handwritten or typewritten. All questions must be briefly answered in the proper space on the form.

3. Completed motions must be mailed to the **Clerk of the United States District Court for the Northern District of Texas** at the appropriate divisional office below:

Abilene Division
341 Pine Street
Room 2008
Abilene, TX 79601

Amarillo Division
205 SE 5th Avenue
Room 133
Amarillo, TX 79101

Dallas Division
1100 Commerce Street
Room 1452
Dallas, TX 75242

Fort Worth Division
501 W. 10th Street
Room 310
Fort Worth, TX 76102

Lubbock Division
1205 Texas Avenue
Room 209
Lubbock, TX 79401

San Angelo Division
33 East Twohig Avenue
Suite 202
San Angelo, TX 76903

Wichita Falls Division
501 W. 10th Street
Room 310
Fort Worth, TX 76102

4. Questionnaires that do not follow these instructions will be returned, and the mistake will be identified.

Questionnaire

1. Name and location of court that entered the sentence that you are asking to reduce:

Northern District Court, Amarillo, TX

2. Date(s) of sentence and judgment of conviction:

December 10, 2019 Guilty

3. Are you currently in prison for this sentence?

X Yes _____ No

4. If so, when is your projected date of release? 1-15-2026

5. Are you currently on supervised release? _____ Yes X No

6. Are you currently in prison because you violated your supervised release for the conviction and sentence identified in response to Questions No. 1 and 2?

_____ Yes X No

7. Is your case currently on appeal? _____ Yes X No

8. Offense(s) for which you were convicted (all counts):

Distribution and Possession with Intent to
Distribute a controlled substance.

9. In calculating the applicable sentencing guideline range, were you assessed any criminal history points (U.S.S.G. § 4A1.1)?

_____ Yes X No _____ Not Sure

9a. **If the answer to Question 9 is "No,"** check the box for all statements that apply to your conviction and sentence:

- ☐ I received criminal history points from Chapter Four, Part A;
- ☐ I received an adjustment under § 3A1.4 (Terrorism);
- ☐ I used violence or credible threats of violence in connection with the offense;
- ☐ the offense resulted in death or serious bodily injury;
- ☐ the instant offense of conviction is a sex offense;
- ☐ I personally caused substantial financial hardship;
- ☐ I possessed, received, purchased, transported, transferred, sold, or otherwise disposed of a firearm or other dangerous weapon (or induced another participant to do so) in connection with the offense;
- ☐ the instant offense of conviction is covered by § 2H1.1 (Offenses Involving Individual Rights);
- ☐ I received an adjustment under § 3A1.1 (Hate Crime Motivation or Vulnerable Victim) or § 3A1.5 (Serious Human Rights Offense);
- ☐ I received an adjustment under § 3B1.1 (Aggravating Role) or was engaged in a continuing criminal enterprise, as defined in 21 U.S.C. § 848; or
- ☒ none of the statements above applies to my case.

10. If the answer to Question 9 is "Yes," were you assessed criminal history points for being "under any criminal justice sentence, including probation, parole, supervised release, imprisonment, work release, or escape status" at the time of the offense (a.k.a. "status points") (U.S.S.G. § 4A1.1(d))?

_____ Yes _____ No _____ Not Sure

11. If the answer to Question 10 is "Yes," how many criminal history points were assessed in total, including the "status points"?

_____ Criminal History Points

12. If you were sentenced on or after April 5, 2023, did the Court provide the benefit of the "status points" or "zero-point offenders" amended guidelines at your sentencing hearing prior to the effective date?

_____ Yes _____ No _____ Not Sure

13. List any good conduct that occurred after your original sentencing hearing or any other mitigating circumstances that you would like the Court to be aware of in deciding whether you should receive a sentence reduction (for example, participating in a drug treatment program, or completing your GED or another degree).

Completed and Received Certificates for Courses below:

1) Drug Abuse Education Course

2) Chaplain Threshold Course

3) Health and Wellness Course

4) GED General Education Development Course

See attached Certificates.

Thank You.

For the reasons stated in this motion, I move the court for a reduction in sentence under 18 U.S.C. § 3582(c)(2) and Amendment 821 to the Federal Sentencing Guidelines. I declare under penalty of perjury that the facts stated in this motion are true and correct.

Respectfully submitted this December 1st, 2023

Krystal Vang
Signature of Defendant

Krystal Vang
Printed Name

57933-177
BOP No.

FPC Bryan
Federal Correctional Institution (if applicable)

P.O. Box 2149
Address

Bryan, Texas 77805
City, State & Zip Code

Certificate of Completion

Presented to

KRYSTAL VANG

For successfully completing the
Drug Abuse Education Course

The Drug Abuse Education Course is a minimum of 12 hours

R. Carabajal

R. Carabajal, Drug Treatment Specialist

8/10/2023

DATE

THRESHOLD

THIS CERTIFIES THAT

KRYSTAL VANG

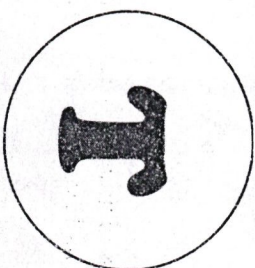
has successfully completed 80 hours of classroom and
individual study required to receive full program credit.

CERTIFICATE OF COMPLETION

Dated this 1st of December, 2023



Chaplain Krohn
Course Instructor



Certified Copy
For Personal Records / Individual Use

Certificate of Completion

Awarded to

VANG

HEALTH AND WELLNESS THROUGHOUT THE LIFESPAN

Awarded this AUGUST, 2023

HTH WELL C (FSA)

57933-177

57933-177



Signature

Office of the State Superintendent of Education

This Certifies That

KRYSTAL VANG

having satisfactorily completed the Tests of General Educational Development
with scores comparable to those of high school graduates,
is hereby awarded this

High School Equivalency Credential

and is entitled to all the Rights and Privileges appertaining thereto.

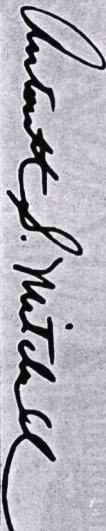
In witness whereof our names are hereto affixed, this the

11th Day of May, 2023



Christina Grant, Ed.D.

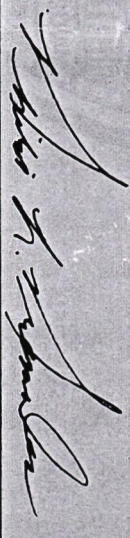
Acting State Superintendent of Education



Antoinette S. Mitchell, Ph.D.

Assistant Superintendent

Postsecondary and Career Education



Philip L. PremDas

GED Administrator



District of Columbia
Office of the State
Superintendent of Education

GOVERNMENT OF THE DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR

